

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

*PLAINTIFF,*

v.

THE STATE OF TEXAS; GREG ABBOTT IN  
HIS OFFICIAL CAPACITY AS GOVERNOR OF  
TEXAS; TEXAS DEPARTMENT OF PUBLIC  
SAFETY; STEVEN C. McCRAW, IN HIS  
OFFICIAL CAPACITY AS DIRECTOR OF  
TEXAS DEPARTMENT OF PUBLIC SAFETY,

*DEFENDANTS.*

CASE NO. 1:24-CV-00008-RP

**DEFENDANTS' NOTICE OF  
UNOPPOSED MOTION TO CONSOLIDATE IN RELATED CASE**

Defendants provide notice to the Court that this lawsuit is one of two pending cases in the Austin Division of the Western District of Texas challenging Texas's law known as S.B. 4. The other case is *Las Americas Immigrant Advocacy Center v. McCraw*, No. 1:23-cv-1537-DII (W.D. Tex.) (filed on December 19, 2024).

Pursuant to the Fifth Circuit's first-to-file rule, Defendants filed the Unopposed Motion to Consolidate in the *Las Americas* case (attached as Exhibit A). As explained in the Motion, as the court where suit was first filed, it is the duty of the *Las Americas* court to determine if the issues presented in this case substantially overlap and, if they do, what to do with the subsequently filed case. *Mann Mfg., Inc. v. Hortex, Inc.*, 439 F.2d 403, 408 (5th Cir. 1971).

Date: January 19, 2024

Respectfully submitted.

**KEN PAXTON**  
Attorney General

/s/Ryan D. Walters  
**RYAN D. WALTERS**  
Chief, Special Litigation Division  
Tex. State Bar No. 24105085

**BRENT WEBSTER**  
First Assistant Attorney General

**DAVID BRYANT**  
Special Counsel  
Tex. State Bar No. 03281500

**GRANT DORFMAN**  
Deputy First Assistant Attorney General

**MUNERA AL-FUHAID**  
Special Counsel  
Tex. State Bar No. 24094501

**RALPH MOLINA**  
Deputy Attorney General for Legal Strategy

**HEATHER L. DYER**  
Special Counsel  
Tex. State Bar No. 24123044

**JACOB E. PRZADA**  
Special Counsel  
Tex. State Bar No. 24125371

OFFICE OF THE ATTORNEY GENERAL OF TEXAS  
Special Litigation Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
Tel.: (512) 463-2100  
Ryan.Walters@oag.texas.gov  
David.Bryant@oag.texas.gov  
Munera.Al-fuhaid@oag.texas.gov  
Heather.Dyer@oag.texas.gov  
Jacob.Przada@oag.texas.gov

**COUNSEL FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on January 19, 2024 and that all counsel of record were served by CM/ECF.

/s/Ryan D. Walters  
**RYAN D. WALTERS**